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7 Attorneys for Defendant  
8 Metropolitan Life Insurance Company

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10 **UNITED STATES DISTRICT COURT**  
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12 **NORTHERN DISTRICT OF CALIFORNIA**

13 JOHN KRESICH,  
14 Plaintiff,  
15 vs.  
16 METROPOLITAN LIFE INSURANCE  
17 COMPANY, Does 1-50,  
18 Defendants.

19 Case No.: 15-cv-05801-MEJ

20 **STIPULATION TO CONTINUE  
DISCOVERY CUT-OFF AND  
MOTION FILING CUT-OFF BY  
TWO MONTHS; [PROPOSED]  
ORDER**

21 Complaint Filed: July 13, 2015  
22 Trial Date: None

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29 STIPULATION TO CONTINUE DISCOVERY CUT-OFF AND MOTION FILING CUT-OFF  
30 BY TWO MONTHS

1           **TO THE COURT AND THE COURT CLERK:**

2           Plaintiff John Kresich ("Plaintiff") and Defendant Metropolitan Life  
 3 Insurance Company ("MetLife") hereby stipulate, through their counsel of record,  
 4 to request the Court to extend by two months the current discovery cutoff date of  
 5 November 1, 2016, and the current deadline for filing motions of December 1,  
 6 2016. The requested extensions will have no impact on the trial date.

7           The parties respectfully request that the discovery cut-off be continued  
 8 through and including December 31, 2016, and request that the motion filing  
 9 deadline be continued through and including February 1, 2017.

10          Good cause exist for the extension of the discovery deadline, scheduling  
 11 conflicts beyond the control of the parties and their counsel have prevented  
 12 completion of discovery, including the taking of numerous depositions. Good  
 13 cause exists for the extension of the motion filing deadline, as the fact necessary  
 14 discovery has not been completed has prevented the parties from fully evaluating  
 15 the need for, and the preparation of possibly dispositive motions.

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17          DATED: November 8, 2016                                   RAY BOURHIS ASSOCIATES

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19   By: /s/Eric Whitehead  
 20   Ray Bourhis  
    Eric Whitehead  
    Attorneys for Plaintiff John Kresich

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22          DATED: November 8, 2016                                   HINSHAW & CULBERTSON LLP

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24   By: /s/ Royal F. Oakes  
 25   Royal F. Oakes  
    Michael A.S. Newman  
    James C. Castle  
    Attorneys for Defendant Metropolitan  
    Life Insurance Company

1                   **[PROPOSED] ORDER**

2                   Having reviewed the parties' stipulation and good cause appearing, the Court  
                  the following schedule. See below.  
 3 hereby orders that the discovery cut off is extended to December 31, 2016 and the  
 4 motion filing deadline is extended to February 1, 2017.

5                   **IT IS SO ORDERED.**

6                   DATED: November 9, 2016

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 8                   Jury Trial (5 days): 8/7/2017 @ 9:30 a.m.  
 9                   Pretrial Conference: 6/29/2017 @ 10:00 a.m.  
 10                  Final Pretrial Conference: 7/27/2017 @ 10:00 a.m.  
 11                  Disclosure of Experts Witnesses: 12/20/2016  
 12                  Disclosure of Rebuttal Expert Witnessed: 12/30/2016  
 13                  Discovery Cut-off: 1/17/2017  
 14                  Deadline to file Dispositive Motions: 2/16/2017  
 15                  Hearing on Dispositive Motions: 3/23/2017  
 16                  Exchange of Pretrial Disclosures: 5/24/2017  
 17                  Deadline to File Pretrial Conference Statements  
 18                  and related disclosures; Motions in Limine; and Trial  
 19                  Briefs and related disclosures: 6/8/2017  
 20                  Deadline to file Motions in Limine Oppositions: 6/15/2017

